

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NORTH DAKOTA

In re:

Stark Energy, Inc.,

Chapter 11, Subchapter V

Case No. 24-30168

Debtor.

MOTION FOR CONTINUANCE OF CONFIRMATION HEARING

The Debtor, by his undersigned attorney, respectfully requests a continuance of the confirmation hearing currently scheduled for Wednesday, October 16, 2024, as well as an extension of the October 14, 2024 deadline to submit exhibits in support of confirmation.

The Debtor requests that the deadline be extended to December of 2024. The court has jurisdiction of this case pursuant to 28 U.S.C. §§ 157 and 1334.

1. The United States Trustee filed an objection to the Debtor's confirmation expressing concern, among other issues, that (a) Debtor has not shown an history of financial performance, though its accounts receivable indicate an improvement in financial performance, and (b) that the Debtor has not filed tax returns.

2. Both of these issues have arisen, in significant part, as a result of the Debtor losing a significant portion of its equipment. The Debtor is now showing improved financial performance that both allows the Debtor to retain its accountant to complete the tax returns, and to show the financial performance required to perform under its plan. The Debtor will be filing an application to retain its accountant shortly.

3. The Debtor, through its attorney, has communicated with the United States Trustee on these issues and has requested a continuance of the confirmation hearing to allow the Debtor to demonstrate the financial performance required to confirm its plan and to file its tax returns. The United States Trustee has indicated by email that it would not object to a continuance.

4. The continuance would also allow the Debtor to file an amended plan with minor changes to address other issues raised by the United States Trustee and by creditor Ally Bank.

WHEREFORE, the Debtor respectfully requests a continuance of the confirmation hearing to December of 2024 as well as an extension of the deadline to submit exhibits in support of confirmation to a date based on the date of the continued confirmation hearing.

Ahlgren Law Office, PLLC

Dated: October 11, 2024

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